

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

JAY CONNOR,

Plaintiff,

Case No. 2:24-cv-06361-DCN

v.

MY DOCTORS LIVE, LLC, *et al.*,

Defendants.

\_\_\_\_\_ /

**DEFENDANT MY DOCTORS LIVE’S UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO FILE RESPONSE TO PLAINTIFF’S COMPLAINT**

Defendant My Doctors Live, LLC (“My Doctors Live”) moves, pursuant to Fed. R. Civ. P. 6(b) and D.S.C. L.R. 6.01, for entry of an order granting it an unopposed thirty-day extension until January 2, 2025 to respond to Plaintiff’s Complaint.

1. On November 7, 2024, Plaintiff filed the Complaint, alleging an action under the Telephone Consumer Protection Act, 47 U.S.C. § 227, and an action under the South Carolina Telephone Privacy Protection Act. S.C. Code § 37-21-10. [ECF No. 1].

2. My Doctors Live was served with the Summons and Complaint on November 12, 2024 [ECF No. 6] and its response is due on December 3, 2024.

3. Undersigned counsel and its co-counsel for whom a pro hac vice motion will be forthcoming have only recently been retained and are in the process of evaluating and investigating the allegations in the Complaint.

4. Good cause exists for the requested extension of time as it will allow My Doctors Live's counsel to complete its investigation of the allegations in the Complaint and evaluate an answer and/or motion in response thereto.

5. Counsel for My Doctors Live has conferred with counsel for Plaintiff regarding this Motion and both parties have agreed that this extension of time is warranted and the best interest of the parties.

6. The deadline has not previously been extended, and the requested extension will not impact any other deadline.

7. For these reasons, My Doctors Live respectfully requests that this Court grant them an extension of time to January 2, 2025 within which to file a response to Plaintiff's Complaint.

#### **CERTIFICATE OF GOOD FAITH CONFERENCE**

Pursuant to D.S.C. L.R. 7.02, the undersigned counsel certifies that counsel for My Doctors Live conferred in good faith with counsel for Plaintiff concerning the substance of this motion, and that Plaintiff agrees to the relief requested.

Dated: December 3, 2024

Respectfully submitted,

/s/ E. Bart Daniel

*Attorneys for Defendant*

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## CERTIFICATE OF SERVICE

I CERTIFY that a true and correct copy of the foregoing was served via CM/ECF on December \_\_\_\_, 2024, which will send a courtesy copy on all counsel or parties of record, and emailed to the parties and non-parties on the attached service list.

/s/ E. Bart Daniel

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